



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels, Jr.*  
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Commissioner

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March 30, 2011

Mr. John Mundell  
Mundell & Associates  
110 South Downey Avenue  
Indianapolis, IN 46219

Re: Revised Work Plan for Third Round of  
CAP 18 ME Injections  
Michigan Plaza  
3801-3823 West Michigan Street  
Indianapolis, Indiana  
VRP #6061202

Dear Mr. Mundell:

This office has completed review of the Revised Work Plan for Third Round of CAP 18 ME Injections received March 28, 2011 for the Michigan Plaza facility in Indianapolis, Indiana. The report cannot be approved until the following comments are addressed.

Comments:

1. The proposed new well nest to the south is generally acceptable to monitor the groundwater downgradient of the injections in source area A. IDEM also requests a well nest to the west of injection points 21 and 22. These wells along with proposed wells P-MMW-P-11S/D should be sampled prior to the CAP 18 injection event to gather baseline data. The water levels should also be monitored during injections so that supporting data can be gathered to determine if the groundwater gradient is changing and potentially pushing contaminants in unexpected directions. After the injection event, these wells should again be sampled to determine changes in the aquifer from the injections.
2. IDEM requests the next monitoring report include a tabulation of all previous results of bioremediation parameters (dissolved oxygen, iron, magnesium, sulfate, nitrates, etc.) along with the ethane, ethene, and methane parameters. Quarterly sampling of all these parameters is needed for a minimum of one year after injections.

Please notify IDEM when the monitoring wells will be installed so that representatives may be present. After the well installation, please again notify IDEM of the CAP 18 injection schedule. If you have any questions, please contact me at (317) 233-2991, (800) 451-6027, or at [ebrittai@idem.in.gov](mailto:ebrittai@idem.in.gov).

Sincerely,

Erin Brittain, Project Manager  
Voluntary Remediation Program  
Office of Land Quality